1 2 3 4 5 6 7	Rene L. Valladares Federal Public Defender Nevada State Bar No. 11479 *Kimberly Sandberg Assistant Federal Public Defender New York State Bar No. 5152863 411 E. Bonneville Ave., Ste. 250 Las Vegas, Nevada 89101 (702) 388-6577 Kimberly_Sandberg@fd.org	
8	*Attorney for Petitioner Charles Adrian Ford	
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10	UNITED STATES DISTRICT COURT	
11	DISTRICT OF NEVADA	
12	Charles Adrian Ford,	
13	Petitioner,	Case No. 2:17-cv-00112-RFB-VCF
14	v.	Unopposed motion for extension of time to file amended petition for
15	State of Nevada, et al.,	writ of habeas corpus
16	Respondents.	(First request)
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POINTS AND AUTHORITIES

Petitioner Charles Ford moves this Court for the entry of an order extending the time within which he must file an amended petition for writ of habeas corpus by 90 days from October 26, 2018 to and including January 24, 2019. The state, by Deputy Attorney General Ashley A. Balducci, does not object to this request, though her non-objection does not constitute a waiver of any procedural defenses respondents may wish to raise in response to the amended petition including, but not limited to, timeliness, procedural default, and questions of exhaustion.

This is Ford's first request for an extension of time. This motion is not filed for the purposes of delay but in the interests of justice, as well as in the interests of Ford.

Counsel first met with Ford on September 21, 2018. At this meeting, counsel realized further investigation of the case is necessary. Counsel requested and was given an investigator for Ford's case. Although investigation is already underway, the investigation will take more time. Counsel may also hire an expert for Ford's case.

Counsel hopes to incorporate the findings from the investigation into the amended petition for writ of habeas corpus. Also, counsel may incorporate expert findings into the petition. Both the investigation and the consultation with an expert will require more time. For these reasons, counsel respectfully asks this Court to grant Ford's request to extend the time for filing an amended petition by 90 days until January 24, 2019.

1	Dated October 25, 2018.	
2		Respectfully submitted,
3		Rene L. Valladares
4		Federal Public Defender
5		/s/Kimberly Sandberg
6		KIMBERLY SANDBERG
7		Assistant Federal Public Defender
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10		IT IS SO ORDERED:
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13		RICHARD F. BOULWARE, II United States District Court
14		Dated: October 29, 2018.
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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, District of Nevada by using the CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system and include: Ashley A. Balducci.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing by First-Class Mail, postage pre-paid, or have dispatched it to a third party commercial carrier for delivery within three calendar days, to the following non-CM/ECF participants:

Charles Adrian Ford No. 1073007 Southern Desert Correctional Center P.O. Box 208 Indian Springs, NV 89070

/s/Jessica Pillsbury

An Employee of the Federal Public Defender

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